

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

In re: BERNARD CHAPMAN
ELLA CHAPMAN,
Debtors

CHAPTER 13
CASE NO: 24-51755 KMS

TRUSTEE'S OBJECTION TO CONFIRMATION OF MODIFIED PLAN
(PRE-CONFIRMATION)

Comes now David Rawlings, Standing Chapter 13 Trustee who would show the following for which relief is sought. It is reasonably believed, and the proof will show that the Chapter 13 Plan (DK #35) modified on 04/09/2025 fails to comply with the following:

1. 11 U.S.C. §1325(a). The plan does not comply with the provisions of Chapter 13 and with other applicable provisions of the Bankruptcy Code **in that Part 3.1(a) of the plan reflects erroneous beginning and through dates regarding the ongoing mortgage and arrears.**

Because the modified plan does not comply with the applicable provisions of the Bankruptcy Code, the case should be dismissed pursuant to 11 U.S.C. §1307, or confirmation should be denied and the debtor given an opportunity to submit a modified plan within reasonable time.

PREMISES CONSIDERED, David Rawlings, Chapter 13 Trustee prays:

1. That the Court either dismiss the Chapter 13 case pursuant to 11 U.S.C. §1307, sustain the objection, or deny confirmation and grant the debtor a reasonable time in which to submit a modified plan.
2. The Trustee hereby objects to any amended plan filed hereafter.

3. That the Chapter 13 Trustee be granted such other and further relief to which he may be entitled.

Dated: 04/22/2025

/s/ David Rawlings

David Rawlings

Chapter 13 Trustee
P.O. Box 566
Hattiesburg, MS 39403
(601) 582-5011

drawlings@rawlings13.net

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have on this day forwarded a true and correct copy of the foregoing Objection via the Court's ECF filing system, to: The U.S. Trustee, 501 East Court Street, Suite 6-430, Jackson, Mississippi 39201; Thomas Carl Rollins, Jr., The Rollins Law Firm, PLLC, PO Box 13767, Jackson, MS 39236.

So certified this 22nd day of April, 2025.

/s/ David Rawlings

David Rawlings, Trustee